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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$324,650.00 IN
U.S. CURRENCY,

15 Defendant.
16

2:22-MC-00068-KJM-CKD

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant
18 Valentina Miles (“claimant”), by and through their respective counsel, as follows:

19 1. On or about November 17, 2021, claimant Miles filed a claim in the administrative
20 forfeiture proceedings with the Drug Enforcement Administration with respect to the Approximately
21 \$324,650.00 in U.S. Currency (hereafter “defendant currency”), which was seized on August 25, 2021.

22 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
23 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
24 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other
25 than the claimant has filed a claim to the defendant currency as required by law in the administrative
26 forfeiture proceeding.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
2 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of the
3 parties. That deadline was February 15, 2022.

4 4. By Stipulation and Order filed March 1, 2022, the parties stipulated to extend to May 16,
5 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
7 forfeiture.

8 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
9 to August 15, 2022, the time in which the United States is required to file a civil complaint for forfeiture
10 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
11 subject to forfeiture.

12 6. Accordingly, the parties agree that the deadline by which the United States shall be
13 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
14 alleging that the defendant currency is subject to forfeiture shall be extended to August 15, 2022.

15 Dated: 5/9/2022

PHILLIP A. TALBERT
United States Attorney

17 /s/ Kevin C. Khasigian
18 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

20 Dated: 5/9/2022

21 /s/ Mark J. Reichel
22 MARK J. REICHEL
Attorney for potential claimant
Valentina Miles

23 (As authorized via email)

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25 **IT IS SO ORDERED.**

26 DATED: May 16, 2022.

27 
28 CHIEF UNITED STATES DISTRICT JUDGE